

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA) Case No. 3:13-cr-00100
v.) CHIEF JUDGE HAYNES
REZA KOUSHKBAGHI)

JOINT MOTION TO CONTINUE STATUS CONFERENCE

The parties, by and through their respective counsel, hereby move to continue the status conference set today at 4:00 P.M. In support of this Motion, the parties would state as follows:

1. On May 20, 2013, the Defendant pleaded guilty to conspiracy to distribute and to possess with intent to possess opium in violation of 21 U.S.C. § 846 in Case No. 3:09-cr-00218-1. A sentencing hearing is set for August 12, 2013 at 3:00 P.M. on that case.
2. The Defendant was charged with money laundering pursuant to an felony information on May 29, 2013, which is this case.
3. The Defendant had initially intended to plead guilty to money laundering and enter into a voluntary plea of guilty in this case and to be sentenced on both cases on August 12, 2013.
4. The Defendant now questions whether there is a factual and/or legal basis to enter a guilty plea on a charge of money laundering.
5. The parties have engaged in discussions and legal research regarding the money laundering charge, but agree that they need more time is needed in order to determine if there is going to be an ongoing dispute as to whether Mr. Koushkbaghi is guilty of the money laundering. Both parties are currently researching the legal issues.
6. The undersigned counsel requests this continuance of this hearing and additional time to research the legal issues and discuss the issues with the Government in order to provide effective

*DR. DEM
This motion
is GRANTED
Well
7-29-13*